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# Before the POSTAL RATE COMMISSION WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

## STAMPS.COM'S SECOND SET OF INSTITUTIONAL INTERROGATORIES TO USPS (STAMPS.COM/USPS - 7 - 11)

Pursuant to sections 25 and 26 of the Rules of Practice, Stamps.com submits these interrogatories to the U.S. Postal Service, Stamps.com/USPS - 7 - 11. Please direct them to the appropriate person or witness who can provide a complete response.

Respectfully submitted,

David P. Hendel

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Counsel for Stamps.com

Dated: July 31, 2000

### STAMPS.COM'S SECOND SET OF INSTITUTIONAL INTERROGATORIES TO USPS

#### STAMPS.COM/USPS - 7

Please state all reasons why the Postal Service believes a handwritten benchmark is appropriate for determining the QBRM discount but would not be appropriate for determining the PC Postage discount proposed by Stamps.com and E-Stamp.

#### STAMPS.COM/USPS - 8

Assuming that the Commission wishes to adopt the PC Postage discount proposals presented by Stamps.com and E-Stamp, what benchmark does the Postal Service believe is appropriate to use in order to calculate the discount, and why.

#### STAMPS.COM/USPS - 9

Please state whether, in support of or conjunction with its QBRM proposal in R97-1, USPS conducted any studies or analyses to determine the amount of handwritten mail that would migrate from other classes of mail to QBRM. If so, describe the conclusions reached and provide a copy of each study.

#### STAMPS.COM/USPS - 10

Please state whether, in support of or conjunction with its QBRM proposal in R2000-1, USPS conducted any studies or analyses to determine the amount of handwritten mail that would migrate from other classes of mail to QBRM. If so, describe the conclusions reached and provide a copy of each study.

#### STAMPS.COM/USPS - 11

If the Postal Service did not conduct any studies or analyses to determine the amount of handwritten mail that would migrate from other classes of mail to QBRM, please explain why the Postal Service believes such studies should be performed to support the PC Postage discount proposals presented by Stamps.com and E-Stamp.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 3/ day of July	2000, served the
foregoing document upon all participants of record in this proceedi	ng having requested
service of discovery documents in accordance with Section 12 of t	he rules of practice.

David P. Hendel